

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a
Delaware corporation,

Plaintiff,

v.

FAIRCHILD SEMICONDUCTOR
INTERNATIONAL, INC., a Delaware
corporation, and FAIRCHILD
SEMICONDUCTOR CORPORATION, a
Delaware corporation,

Defendants.

C.A. No. 04-1371-JJF

REDACTED

**DECLARATION OF WILLIAM J. MARSDEN, JR. IN SUPPORT OF
PLAINTIFF'S ANSWER TO DEFENDANTS' MOTION TO COMPEL THE
CONTINUED DEPOSITIONS OF LEIF LUND AND BALU BALAKRISHNAN**

I, William J. Marsden, Jr., declare as follows:

1. I am a principal of Fish & Richardson P.C., counsel of record in this action for Plaintiff Power Integrations, Inc. ("Power Integrations"). I am a member of the Bar of the State of Delaware and of this Court. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. Attached hereto as Exhibit A is a true and correct copy of the Highly Confidential – Outside Counsel Only transcript of Leif Lund's August 15, 2005 deposition.
3. Attached hereto as Exhibit B is a true and correct copy of an email from Brian VanderZanden to Michael Headley re Balu's depo, dated November 18, 2005.
4. Attached hereto as Exhibit C is a true and correct copy of an email from Michael Headley to Brian Vanderzanden re PI-Fairchild: SMP schematics & documents, dated November 22, 2005.

5. Attached hereto as Exhibit D is a true and correct copy of a letter from Kerry Smith to Brian Vanderzanden enclosing document production CDs re *Power Integrations v Fairchild Semiconductor et al.*, dated November 22, 2005.

6. Attached hereto as Exhibit E is a true and correct copy of a letter from Brian VanderZanden to Michael R. Headley re *Power Integrations v Fairchild Semiconductor et al.*, dated November 22, 2005.

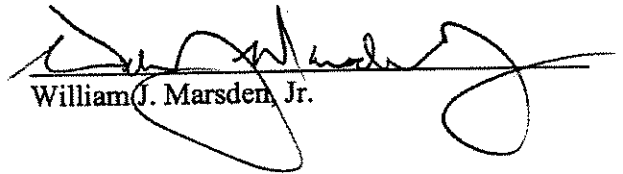
7. Attached hereto as Exhibit F is a true and correct copy of a letter from Bas de Blank to Michael Headley re *Power Integrations v Fairchild Semiconductor et al.*, dated December 21, 2005.

8. Attached hereto as Exhibit G is a true and correct copy of a letter from Michael R. Headley to Brian VanderZanden re *Power Integrations v Fairchild Semiconductor et al.*, dated December 5, 2005.

9. Attached hereto as Exhibit H is a true and correct copy of a letter from Brian VanderZanden to Michael Headley re *Power Integrations v Fairchild Semiconductor et al.*, dated December 30, 2005.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 2nd day of January, 2006, at Wilmington, Delaware.


William J. Marsden, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2006, I electronically filed with the Clerk of Court using CM/ECF Public Version of Declaration of William J. Marsden, Jr. in Support of Plaintiff's Answer to Defendants' Motion to Compel the Continued Depositions of Leif Lund and Balu Balakrishnan which will send electronic notification of such filing(s) to the following Delaware counsel.

Steven J. Balick, Esq.
John G. Day, Esquire
Ashby & Geddes
222 Delaware Avenue, 17th Floor
P. O. Box 1150
Wilmington, DE 19899

Attorneys for Defendant-
Counterclaimant
FAIRCHILD SEMICONDUCTOR
INTERNATIONAL, INC. and
FAIRCHILD SEMICONDUCTOR
CORPORATION

I hereby certify that on February 15, 2006, I have mailed by United States Postal Service, the document(s) to the following non-registered participants:

BY MAIL
G. Hopkins Guy, III
Bas de Blank
Duo Chen
Orrick, Herrington & Sutcliffe, LLP
1000 Marsh Road
Menlo Park, CA 94025

Attorneys for Defendants
FAIRCHILD SEMICONDUCTOR
INTERNATIONAL, INC. and
FAIRCHILD SEMICONDUCTOR
CORPORATION

/s/ William J. Marsden, Jr.

William J. Marsden, Jr.

A

**EXHIBIT REDACTED
IN ITS ENTIRETY**

B

Michael Headley

From: VanderZanden, Brian [bVanderZanden@orrick.com]
Sent: Friday, November 18, 2005 9:03 PM
To: Michael Headley
Cc: G. Hop Guy; de Blank, Bas
Subject: Balu's depo

Michael,

At today's depo we asked Balu to bring some of his notebooks to Wednesday's depo. Howard assured us that these notebooks had been produced, and that you would be able to identify the Bates range for us. He mentioned that Judith or Carrie had assisted with identifying these documents for another matter.

Also, we would like to get physical samples of PI's products. These would be 1) all devices that practice the asserted patents; 2) all devices that pre-date the filing of the applications for the '366, '851, and '876; and 3) the SMP3, SMP240, SMP260, and SMP211, if you are able to find them.

Thanks for your help,

Brian

BRIAN VANDERZANDEN
associate

ORRICK, HERRINGTON & SUTCLIFFE LLP
tel 650-614-7629
fax 650-614-7401
email bvanderzanden@orrick.com
www.orrick.com

From Orrick, Herrington & Sutcliffe LLP <orrick.com> on 11/18/2005 05:59:46 PM

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2/2/2006

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C

Michael Headley

From: Michael Headley
Sent: Tuesday, November 22, 2005 11:35 AM
To: Brian Vanderzanden (bvanderzanden@orrick.com)
Cc: G. Hop Guy; 'de Blank, Bas'; Howard Pollack
Subject: Re: PI-Fairchild: SMP schematics & documents

Attachments: HIGHLY CONFIDENTIAL PI SMP240-260 schematics.pdf; HIGHLY CONFIDENTIAL PI SMP3 schematics.pdf; HIGHLY CONFIDENTIAL PI SMP211 schematics.pdf

Dear Brian,

I am writing to follow up with regard to Fairchild's request for SMP documents and samples.

The SMP parts you requested Friday evening have long been out of production, and Power Integrations has not located samples despite checking with the inventors and the Marketing and Operations departments. As such, Power Integrations cannot provide a production sample of the SMP3, SMP211, or SMP240/260 parts. During the course of its investigation, though, Power Integrations located additional schematics for the SMP3, SMP211, and SMP240/260 products, along with a few small binders of documents regarding the SMP products. We will be producing copies of these documents as soon as they can be prepared for production, but I've attached PDF copies of the SMP schematics to this e-mail in unnumbered/unlabeled electronic form to speed up your review of the documents. Please treat these documents as Highly Confidential - Outside Counsel Only, and destroy these documents (and any copies thereof) once you've received the production set later today to prevent any confusion with respect to their status.

Thanks.

Michael R. Headley
Fish & Richardson P.C.
500 Arguello St., Suite 500
Redwood City, CA 94063-1526
(650) 839-5139 (direct)
(650) 839-5071 (fax)

This e-mail may contain confidential and privileged information. If you received it in error, please contact the sender and delete all copies.



HIGHLY



HIGHLY



HIGHLY

CONFIDENTIAL PI SMP2 CONFIDENTIAL PI SMP3 CONFIDENTIAL PI SMP2

D

FISH & RICHARDSON P.C.

Frederick P. Fish
1855-1930

W.K. Richardson
1859-1931

VIA HAND DELIVERY

November 22, 2005

Brian Vanderzanden
Orrick, Herrington & Sutcliffe LLP
1000 Marsh Road
Menlo Park, CA 94025

Re: Power Integrations, Inc. v. Fairchild Semiconductor International
USDC-D. Del. - C.A. No. 04-1371-JJF

Dear Brian:

Enclosed for your review, please find one compact disc (CD050) containing production documents for the above mentioned matter. This disc contains documents labeled PIF 129301 - 130027. This CD contains the complete set of SMP documents Mr. Headley referenced in his earlier e-mail to you. Please destroy any copies of the schematics he sent you in that e-mail and replace them with these numbered documents to prevent any confusion as to the status of the documents.

Please note these documents have been designated "Highly Confidential - Outside Counsel Only" pursuant to the protective order.

Very truly yours,



Kerry B. Smith
Litigation Paralegal

Enclosure

cc: Steven J. Balick (by fax without encl.)


50313799.doc

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WASHINGTON, DC

E

11/22/2005 17:28 FAX 650 614 7401

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002/003



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November 21, 2005

Brian H. VanderZanden
(650) 614-7629
bvanderzanden@orrick.com

VIA FACSIMILE AND U.S. MAIL

Michael R. Headley
Fish & Richardson P.C.
500 Arguello Street, Suite 500
Redwood City, CA 94036

Re: Power Integrations v. Fairchild Semiconductor et al. (CA 04-1371 JJF)

Dear Michael:

I write in response to your e-mails of November 20, 2005 and November 22, 2005.

Thank you for providing schematics for the SMP3, SMP240, SMP260, and SMP211 devices. While we appreciate that PI has now produced these documents, we have been requesting these for close to a year and you repeatedly stated that they no longer existed. Please explain what changed.

I understand that you claim that PI no longer has any samples of its SMP3, SMP240, SMP260, and SMP211 devices. Given the confusion with respect to the schematics, however, we request that you double check. If PI continues to claim it lacks these devices, please let us know when PI last possessed them and what happened to them.

Furthermore, please produce physical samples of the following Power Integrations products: 1) All devices that practice the asserted patents; and 2) all devices that pre-date the filing of the applications for the '366, '851, and '876 patents. If some of these products are no longer available, as your e-mail suggests, please specify which ones and let us know when they were discontinued.

You state in your e-mail that Fairchild is asking for a large number of devices. These products, however, are small and inexpensive, and to clarify, we are not requesting various packaging types for each product. One package type for each of the specific Power Integration products should be sufficient.

11/22/2005 17:30 FAX 850 814 7401

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003/003



Michael R. Headley
November 21, 2005
Page 2

Fairchild asked that these products be produced back in January. PI has yet to produce a single sample product. By comparison, Fairchild produced samples of over 50 its products to Power Integrations over six months ago.

Please feel free to contact me with any questions or concerns at your earliest convenience.

Sincerely,


Brian H. VanderZanden

BHV:ma5

cc: William J. Marsden, Jr.
Howard G. Pollack

11/22/2005 17:28 FAX 650 614 7401

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DATE November 22, 2005

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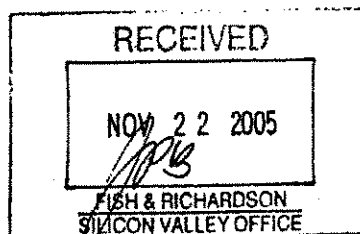
FROM
name Brian H. VanderZanden tel (650) 614-7629

TO
name company/firm tel fax
Michael R. Headley FISH & RICHARDSON P.C. (650) 839-5071
Howard G. Pollack
William J. Marsden, Jr. FISH & RICHARDSON P.C. (302) 652-0607

RE Power Integrations v. Fairchild Semiconductor, et al

MESSAGE

Please see attached.



C-M-A 10414-25(7703)

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December 21, 2005

Bas de Blank
(650) 614-7343
basdeblank@orrick.com

VIA FACSIMILE

Michael Headley
Fish & Richardson P.C.
500 Arguello Street
Suite 500
Redwood City, CA 94036

Re: Power Integrations v. Fairchild Semiconductor et al. (CA 04-1371 JJF)

Dear Michael:

As you know, Fairchild has been requesting information concerning the design and operation of Power Integrations' own prior art devices – including the SMP3, SMP211, SMP240 and SMP260 devices – since January, 2005. For almost 11 months, Power Integrations has repeatedly stated that it had produced all of the documents it possessed and that it had no further schematics describing these products. These representations were made on the record during the deposition of Power Integrations' witnesses, by correspondence, and during our conversations.

Notwithstanding Power Integrations' repeated statements to the contrary, Power Integrations did possess schematics and other documents describing its prior art devices. Unfortunately, Power Integrations did not produce these documents until the evening of November 22, 2005 – shortly before the third day of Mr. Balakrishnan's deposition. Power Integrations delay precluded Fairchild from completing Mr. Balakrishnan's deposition. Indeed, the majority of the third day of deposition was spent reviewing the documents Power Integrations had previously failed to disclose.

Thus, Fairchild needs to continue the deposition of Balu Balakrishnan. Similarly, Fairchild needs to continue the deposition of Lief Lund, an inventor on the asserted patents and one of the individuals that developed the prior art circuits. Please let me know as soon as possible when Messrs. Lund and Balakrishnan are available for deposition.

Sincerely,

Bas de Blank

cc: William J. Marsden, Jr.
Howard G. Pollack

12/21/2005 17:58 FAX

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001/002



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FAX TRANSMISSION

DATE December 21, 2005

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name

tel

Bas de Blank

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TO

name

company/firm

tel

fax

Michael Headley

FISH & RICHARDSON P.C.

650.839.5071

cc

William J. Marsden, Jr.

FISH & RICHARDSON P.C.

302.652-0607

Howard G. Pollack

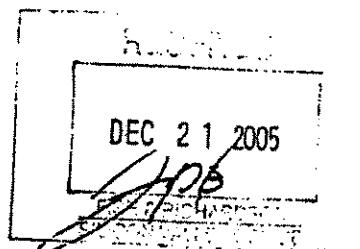
FISH & RICHARDSON P.C.

650.839.5071

RE *Power Integrations v. Fairchild Semiconductor et al*

MESSAGE

Please see attached.



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G

FISH & RICHARDSON P.C.

Frederick P. Fish
1855-1930

W.K. Richardson
1859-1951

VIA FACSIMILE & U.S. MAIL

December 5, 2005

Brian VanderZanden
Orrick, Herrington & Sutcliffe LLP
1000 Marsh Road
Menlo Park, CA 94025

Re: Power Integrations Inc. v. Fairchild Semiconductor Int'l
USDC-D. Del. - C.A. No. 04-1371-JJF

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AUSTIN
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TWIN CITIES
WASHINGTON, DC

Dear Brian:

I am writing to set the record straight with respect to the production of documents regarding the Power Integrations SMP devices. Although your letter of November 21 asserted that Fairchild has been seeking production of SMP documents for "close to a year," we both know that is not the case. Fairchild's first set of Requests for Production made no reference to SMP products, and these products did not become part of Fairchild's case until much later. The first Request for Production to call them out, Request No. 174, did not have a response date until the last day for paper discovery under the original Court order (June 30). In responding to that Request, Power Integrations checked with the inventors and those responsible for the SMP products and produced the few SMP-related documents it found.

When your colleague Bas de Blank asked that Power Integrations make another search for documents regarding the SMP products during the deposition of Leif Lund on August 15, Power Integrations once again searched for SMP-related documents. Unfortunately, by the time Power Integrations conducted that further search, the one person who happened to have additional SMP documents (David Kung), was in the hospital. As such, Power Integrations did not learn of the existence of the SMP schematics in Mr. Kung's possession at that time.

When, even later, you inquired about samples of the SMP products, Power Integrations once again checked with the inventors, marketing, and operations personnel. Although Mr. Kung had been quarantined and was in the office infrequently by that time, he happened to be in the office on one such day and noted that he had a few small binders of SMP-related documents. As soon as we learned of those binders, I scanned and sent electronic copies of the schematics Mr. de Blank (and provided production copies immediately thereafter), which permitted the documents to be used during the deposition of Mr. Balakrishnan.


FISH & RICHARDSON P.C.

Brian VanderZanden
December 5, 2005
Page 2

I certainly regret that Mr. Kung's health and hospitalization resulted in the delay of production, but these things were beyond anyone's control.

I trust this explanation puts the matter to rest.

Sincerely,



Michael R. Headley

/vfl

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12/30/2005 14:53 FAX

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December 30, 2005

Bas de Blank
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VIA FACSIMILE

Michael Headley
Fish & Richardson P.C.
500 Arguello Street
Suite 500
Redwood City, CA 94036

Re: Power Integrations v. Fairchild Semiconductor et al. (CA 04-1371 JJF)

Dear Michael:

I write in response to your letter of December 22, 2005 concerning the continued depositions of Messrs. Lund and Balakrishnan. In your letter, you request the basis for Fairchild's request. The basis is simple -- Power Integrations withheld from Fairchild highly material schematics of Power Integrations' own devices until these depositions were either complete or nearly complete. These schematics show that many of the claims of Power Integrations' patents are anticipated by Power Integrations' own prior art. This prior art was developed by Messrs. Balakrishnan and Lund. Despite their knowledge of this prior art, neither Mr. Balakrishnan nor Mr. Lund provided it to the Patent Office. This clear violation of their duty of candor renders the claims unenforceable, as well as invalid.

Specifically, Fairchild requested schematics for Power Integrations prior art devices months before Mr. Lund's deposition. Power Integrations did not, however, produce them. During his deposition, Mr. Lund testified that he could not recall certain information without the schematics. Once again, Fairchild requested the schematics. Power Integrations' attorney stated on the record that all schematics had been produced. When Mr. Lund began to correct him and state where the schematics were located, Power Integrations attorney cut him off:

Mr. de Blank: Well, thank you very much. Then I have no further questions for Mr. Lund at this point, though I would ask if you could look for and produce the schematics, data sheets, application notes and such related to the SMP240 and 260 devices. I'm not sure those have been produced.

Mr. Pollack: My understanding is what we had on those devices was produced.

Mr. de Blank: Okay.

Mr. Pollack: It was not much because they are really old, long, obsolete devices, but I know that we did collect some stuff, and I'm pretty sure it's been produced, but I can -- I'll go back and double-check if we have anything more.

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12/30/2005 14:53 FAX

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003/003



Michael Headley
12/30/2005
Page 2

Mr. de Blank: I understand. If you could just verify with Mr. Lund off line whether he has the schematics in his office or elsewhere.

Mr. Pollack: Yeah. My understanding, at least, and expectation -- though I wasn't directly involved -- is that the materials we did collect from the -- about the SMP260 came from Leif, so --

The Witness: There are schematics in the --

Mr. Pollack: Okay.

Power Integrations did not produce the schematics. Consequently, Fairchild proceeded with the deposition of Mr. Balakrishnan.

As you know, Fairchild has believed that given Mr. Balakrishnan's significance as the lead inventor on three of the four asserted patents and Power Integrations' insistence that Mr. Balakrishnan be Power Integrations' 30(b)(6) deponent on the majority of deposition topics, Mr. Balakrishnan's deposition would take at least four days. He has only been deposed for three days. Moreover, late in the night before the third day of deposition, Power Integrations *finally* produced the schematics it had withheld. That night, Power Integrations produced 727 pages of missing schematics that confirmed that Power Integrations' own devices anticipated the presently asserted claims. At great effort, Fairchild attorneys began to review those pages that night and were able to ask some questions of Mr. Balakrishnan about those documents. Now that Fairchild has had time to review this production, Fairchild has additional questions for Mr. Balakrishnan about these documents. Moreover, since Fairchild was forced to devote a significant portion of the third day of Mr. Balakrishnan's deposition to these late produced documents, Fairchild was unable to ask Mr. Balakrishnan questions concerning other topics for which he is designated to testify and/or knowledgeable.

Thus, Fairchild insists on its right to continue the depositions of Messrs. Lund and Balakrishnan. If Power Integrations will not agree to produce these witnesses, please let me know at once and Fairchild will move to compel this testimony. If Power Integrations will agree to produce these witnesses, please let me know what dates they will be available.

Sincerely,

Bas de Blank

cc: William J. Marsden, Jr.
Howard G. Pollack